

Privacy Policy – October 2018

1. Who I Am

- 1.1 My name is Helen E. Pearson, Independent Speech and Language Therapist. I am a UK Practicing SLT registered with the Health and Care Professions Council (HCPC). I practice under my own name as well as under the brand name of Kids Communication.
- 1.2 I operate a website at www.kids-communication.co.uk
- 1.3 I am committed to protecting the privacy of any information provided to me, both for and by clients.

2. Collection of Personal Information

- 2.1 Information about a child/young person may be collected via spoken or written liaison with parents/guardians. With parental consent, information may also be collected from other professionals working with the child/young person (e.g. teachers, Educational Psychologists, other Speech and Language Therapists) and legal professionals in the case of Medico-Legal work. Information might also be collected about family members where this is pertinent to the child/young person (e.g. contact details and relevant medical or developmental history).
- 2.2 The www.kids-communication.co.uk website can be used without providing any personal information.
- 2.3 Initial enquiries via telephone or email may lead to the recording/storing of personal information. If an enquiry does not result in a child/young person being seen by Helen Pearson then this information will be deleted once the enquiry has been dealt with.
- 2.4 The website contains links to other internet sites which are outside of my control and are not covered by this privacy policy. I am not responsible for data which you provide through any such linked websites.

3. Use of Personal Information

- 3.1 Personal information collected via email, telephone or face-to-face contacts is stored and used by Helen Pearson for the purpose of delivering Speech and Language Therapy and/or providing expert witness assessment and advice.
- 3.2 Any sensitive personal details are stored in a secure confidential system, and processed in confidence by Helen Pearson, and shall only be used for the purposes of delivering appropriate Speech and Language Therapy services.

- 3.3 With written consent, information about a child's/young person's speech, language and communication needs may be shared with other professionals involved in a child's care providing it is in the child's best interests. A record of consent is kept within my case-notes.
- 3.4 Unless I am required to do so by law, I will not disclose any personal information collected to another person/professional other than as set out above.
- 3.5 Information on client location may be shared with a trusted person to ensure my personal safety when attending appointments.
- 3.6 I do not employ any agents to process personal data.
- 3.7 I do not give or sell client details to any third parties.

4. How Personal Information is Used

- 4.1 I use the personal information of children/young people to:
- Prepare, plan and provide Speech and Language Therapy services appropriate to the child/young person's needs.
 - Communicate with parents/guardians via post, email, telephone, mobile messages and SMS in relation to:
 - arranging and confirming appointments
 - general communication between appointments
 - sending reports and programmes (password protected)
 - copying in to communications with other professionals
 - sending resources
 - sending invoices and receipts
 - Carry out clinical audit to assess and improve my service. Results of any audits are always presented with all client identities removed.
 - Support my management and administration processes.
- 4.2 Whenever personal identifiers are not needed for the above tasks, they will be removed from the information used.

5. The Storage of Personal Information

- 5.1 All information about a child/young person and his/her Speech and Language Therapy is stored securely to ensure that I have a complete record of my service to them. I keep confidential written notes on each client in accordance with Data Protection Regulations. Electronic information (e.g. reports and email correspondence) is stored on a password protected, single-user PC.

- 5.2 Videos and audio recordings may be taken of clients with written consent. These are temporarily stored on a password protected smart phone. They may be used in order to inform assessment or used as a therapeutic tool. Recordings are deleted when they are no longer of clinical use to the SLT.
- 5.3 A minimal amount of confidential personal information will be physically taken out of my office. When taken away from the office it will be kept on my person or will be locked in the boot of my car.
- 5.4 In accordance with guidelines from the Royal College of Speech and Language Therapists (RCSLT), all records will be kept securely until a child/young person reaches the age of 25 years. After this time, all records will be destroyed by shredding.
- 5.5 Following attendance at a hearing or court case, the 'bundle' will either be returned to the party who instructed me (if requested), will be placed in confidential waste at the court/Tribunal centre or will be shredded by myself. Only documents pertinent to my assessment will be kept as per RCSLT guidelines.

6. Meeting Professional Obligations

- 6.1 It is a legal requirement for all Speech and Language Therapists practicing in the UK to be registered with the Health and Care Professions Council (HCPC). The HCPC has clear standards of conduct, performance and ethics that all registrants must adhere to.
- 6.2 These standards affect the way in which I process and share information. Specifically:
- Standard 2: "Communicate appropriately and effectively – you must share relevant information, where appropriate, with colleagues involved in the care, treatment or other services provided to a service user"*
- Standard 10: "Keep records of your work – you must keep full, clear and accurate records for everyone you care for, treat, or provide other services to. You must complete all records promptly and as soon as possible after providing care, treatment or other services. You must keep records secure by protecting them from loss, damage or inappropriate access"*
- 6.3 For further information the full document can be found at:

<http://www.hpc-uk.org/assets/documents/10002367finalcopyofscpejuly2008.pdf>

7. UK Data Protection Law and EU General Data Protection Regulations

- 7.1 Data Protection Law lays down wide-ranging rules, backed by criminal sanctions, for the processing of information about identifiable, living individuals. It also gives individuals certain rights in relation to personal data held about them by others.

7.2 Helen Pearson is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view my ICO registration by visiting: <https://ico.org.uk/ESDWebPages/Entry/Z3084713>

8. Lawful Basis for Processing Personal Information

8.1 My lawful basis for processing and storing personal information is one of 'legitimate interest' under article 6 of GDPR. I cannot adequately deliver a service to a child/young person without processing their personal information. As it is both a necessity for my service delivery and a benefit to the child/young person, I have a legitimate interest to store his/her data.

8.2 Data relating to an individual's health is classified as 'Special Category Data' under section 9 of GDPR. The regulations specify that health professionals who are "*legally bound to professional secrecy*" may have a lawful basis for processing this data. Speech and Language Therapists are legally bound to keep client information confidential and it is under this condition that I process and store personal information.

9. My Responsibilities

9.1 I am committed to maintaining the security and confidentiality of all children/young people who are known to me in a professional capacity. I actively implement security measures to ensure their information is safe, and audit these regularly.

9.2 I will not release client's personal details to any third party without first seeking consent, unless this is allowed for or required by law.

9.3 I am constantly working to ensure compliance with current data protection regulation.

10. Parent/Guardian Rights

10.1 Data protection legislation gives a parent/guardian various rights. The most important of these are as follows:

- The right to have a copy of the information I hold about the child/young person.
- The right to ask for a record to be amended if it is believed there is an error.

11. Accessing A Child/Young Person's Records

11.1 Parents/guardians can access the information I hold about a child/young person by writing to me at the address given below. Please apply in writing rather than by email in order that I receive an original signature to compare against the records I hold.

11.2 Access will be provided to the records within 30 days of receipt of all necessary information.

11.3 A copy of the child/young person's records will be provided free of charge.

11.4 Please make a request in writing to:

*Helen Pearson
Shelton House,
Burgh Hill,
East Sussex
TN19 7PE*

If there are further questions about how I collect, store and use personal data, please contact me at helen.andy.pearson@btinternet.com

Further information about data protection legislation and your rights as a service user is available from the Information Commissioner's Office or by calling 0303 123 1113, 9am to 5pm, Monday to Friday.